

# **Ex. U**

**Notice of Deposition of William  
Shayne Issued on April 14, 2022**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERIWAY CORPORATION

Plaintiff,

v.

MAY YAN CHEN  
ABILITY CUSTOMS, INC.

Defendants.

No. 19-CV-62009407

**PLAINTIFF'S FIRST NOTICE OF DEPOSITION  
OF WILLIAM SHAYNE**

PLEASE TAKE NOTICE that the undersigned counsel will take the oral deposition of the person named below, before an Official Court Reporter or before a Notary Public, or some other officer duly authorized by law to take depositions, on the date and time indicated below, and at the location indicated below:

**NAME**

**DATE/TIME/LOCATION**

William Shayne

Monday, May 9, 2022  
9:00 am  
2424 E. York St. Ste. 223,  
Philadelphia, PA 19125

Mr. Shayne will be deposed on all underlying facts related to the Power of Attorney and its attached "Terms and Conditions of Services" annexed as Exhibit A to this notice, including but not limited to the following:

- Mr. Shayne's role in creating, modifying, or altering any part of the referenced "Terms and Conditions of Service," or any prior/subsequent version thereof,

which Defendant Chen is currently using to assert a lien over the five cargo containers at issue.

The testimony of Mr. Shayne will be recorded by audio, audiovisual, and stenographic means.

**PLEASE GOVERN YOURSELF ACORDINGLY**

Dated April 14, 2022

/s/ Pete Wolfgram

Pete Wolfgram  
pwolfgram@stratumlaw.com  
Xiyang Zhang  
xzhang@stratumlaw.com  
**Stratum Law LLC**  
150 Monument Road Ste. 207  
Bala Cynwyd, PA 19125

*Attorneys for Plaintiff Ameriway Corporation*

**CERTIFICATE OF SERVICE**

I, Pete Wolfgram, certify that on this 14th day of April, 2022, I caused the foregoing First Notice of Deposition of William Shayne to be served by electronic mail to the following:

Attorney William Shayne  
wshayne@shaynelawgroup.com  
Attorney Richard Schrier  
resincourt@aol.com  
SHAYNE LAW GROUP, P.C.  
Tel 212 566-4949, Fax 212 202-5423  
64 Fulton St. Suite 1000  
New York, NY 10038

*Attorneys for Defendants*

May Yan Chen  
Ability Customs Brokers, Inc.  
13910 Doolittle Dr.,  
San Leandro, CA 94577

/s/ Pete Wolfgram  
Pete Wolfgram  
pwolfgram@stratumlaw.com  
**Stratum Law LLC**  
2424 E. York St. Ste. 223  
Philadelphia, PA 19125  
*Attorney for Plaintiff*